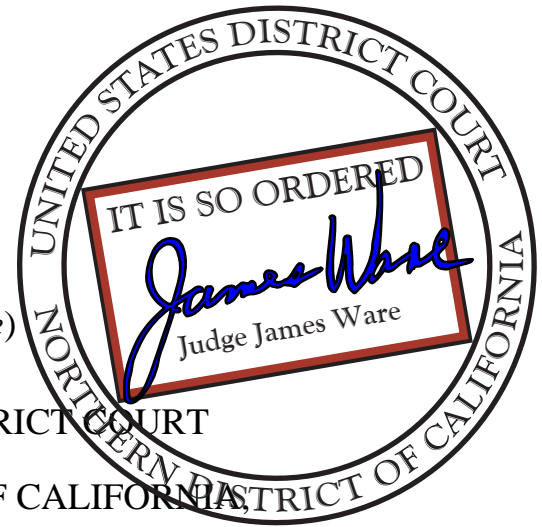


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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LUCHA BOTT, JANE M. TAYLOR  
and JUDE A. ANHELUK, individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

DELPHI AUTOMOTIVE LLP;  
FURUKAWA ELECTRIC CO., LTD.;  
LEAR CORP.; LEONI AG;  
SUMITOMO ELECTRIC  
INDUSTRIES, LTD.; S-Y SYSTEMS  
TECHNOLOGIES GMBH; YAZAKI  
CORP.; YAZAKI NORTH AMERICA  
INC.,

Defendants.

**CASE NO. 3:11-cv-04949-JW**

Hon. James F. Ware

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO CLASS  
ACTION COMPLAINT**

1 Pursuant to Civil Local Rule 6-1, plaintiffs Lucha Bott, Jane M. Taylor and  
2 Jude A. Anheluk (collectively, "Plaintiffs") and defendant Sumitomo Electric  
3 Industries, Ltd. ("Sumitomo") hereby jointly file the instant Stipulation for  
4 Extension of Time to Respond to Class Action Complaint. The Stipulation mirrors  
5 the Stipulation and Order filed by Plaintiffs and defendants Lear Corporation and  
6 Yazaki North America, Inc. that this Court entered on November 1, 2011.

7 Currently pending before the United States Judicial Panel on Multidistrict  
8 Litigation ("JPML") is a motion that was filed on October 11, 2011, pursuant to 28  
9 U.S.C. § 1407, to consolidate for pretrial proceedings a number of related civil  
10 actions that allege that defendants engaged in a price-fixing conspiracy regarding  
11 automotive electrical wire harness systems (the "Related Actions"). So as to  
12 preserve both party and judicial resources pending the JPML's decision in this  
13 matter, plaintiffs and Sumitomo, by and through their undersigned counsel,  
14 stipulate to the following:

15 (1) If the JPML transfers all related civil actions to a single district for  
16 coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407,  
17 Sumitomo shall, as permitted by Federal Rule 12, answer, move or otherwise  
18 respond to the complaint in the above-captioned action (the "Complaint") within  
19 45 days after: (a) the plaintiffs in the consolidated actions serve a consolidated  
20 amended complaint, or (b) the plaintiffs in the consolidated actions serve notice  
21 that they will not file a consolidated amended complaint.

22 (2) If the JPML denies the motion to transfer all related civil actions to a  
23 single district for coordinated or consolidated pretrial proceedings, Sumitomo  
24 shall, as permitted by Federal Rule 12, answer, move or otherwise respond to the  
25 Complaint within 45 days after service of the JPML ruling.

26 (3) If all plaintiffs in the Related Actions agree to consolidate all related civil  
27 actions in a single district and withdraw the pending motions before the JPML, and  
28 Sumitomo has not filed and does not file its own motion to transfer the Related

1 Actions to a single district for coordinated or consolidated pretrial proceedings  
2 pursuant to 28 U.S.C. § 1407, Sumitomo shall, as permitted by Rule 12, answer,  
3 move or otherwise respond to the Complaint within 45 days after: (a) the plaintiffs  
4 in the consolidated actions file a consolidated amended complaint, or (b) the  
5 plaintiffs in the consolidated actions file notice that they will not file a consolidated  
6 amended complaint.

7 (4) Notwithstanding paragraphs (1), (2) or (3), above, if Sumitomo files an  
8 answer, moves or otherwise responds pursuant to Federal Rule 12 in any of the  
9 Related Actions before the date required by this stipulation, Sumitomo will  
10 concurrently file its answer, move or otherwise respond as permitted by Rule 12 in  
11 this matter.

12 (5) Plaintiffs and Sumitomo stipulate and agree that the entry into this  
13 stipulation by Sumitomo shall not constitute a waiver of (a) any jurisdictional  
14 defenses that may be available under Rule 12 of the Federal Rules of Civil  
15 Procedure, (b) any affirmative defenses under Rule 8 of the Federal Rules of Civil  
16 Procedure or (c) any other statutory or common law defenses that may be available  
17 to Sumitomo in this and the other Related Actions. Sumitomo expressly reserves  
18 its rights to raise any such defenses (or any other defense) in response to either the  
19 current Complaint or any amended complaint that may be filed relating to this  
20 action.

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1 IT IS SO STIPULATED.

2 Dated: November 22, 2011

3  
4 Hagens Berman Sobol Shapiro LLP

5  
6 By: /s/ Jeff D. Friedman

7 Jeff. D. Friedman

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1 Dated: November 22, 2011

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